

UNOPPOSED

2. In light of Defendant's upcoming deadline to file a response to the Complaint on or before January 21, 2020, Defendant provides to the Court that more time is needed for the Defendant to adequately respond to the Complaint.

3. Additionally, the parties have already begun settlement discussions. Defendant is optimistic that this matter may be resolved prior to further litigation.

4. Defendant therefore requests that its deadline to respond to Plaintiff's Complaint be extended by **twenty-one (21) days to February 11, 2020**. The requested extension will not prejudice the parties or the Court.

5. Defendant has conferred with counsel for the Plaintiff, and **Plaintiff's counsel conveyed that Plaintiff does not oppose this Motion**.

WHEREFORE, PREMISES CONSIDERED, the parties respectfully request that the Court extend the deadline for Defendant to respond to Plaintiff's Complaint as set forth above.

Respectfully submitted,

/s/ Michael C. Guarino

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of January, 2020, the foregoing document was filed electronically and thereby served on the following counsel of record:

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